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July 12, 2019

VIA ECF

Honorable Lois H. Goodman, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Honorable Douglas E. Arpert, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 East State Street Room 6000
Trenton, New Jersey 08608

Re: *In re Effexor XR Antitrust Litigation*, Case No. 3:11-cv-05479 (D.N.J.) and *In re Lipitor Antitrust Litigation*, Case No. 3:12-cv-02389 (D.N.J.)

Dear Judge Goodman and Judge Arpert:

We write further to the Court's Order dated May 23, 2019 in the above-referenced actions and Orders dated July 2 and July 9, 2019. As outlined in our July 1, 2019 letter to the Court, the parties have been conferring with respect to relevant product market discovery. The parties hereby report that they have reached an agreement on search terms relating to Defendants' relevant product-market related document requests and will now work together on appropriate strategies for applying those search terms or other methods of retrieval to the appropriate custodial and non-custodial sources on a plaintiff-by-plaintiff basis. Further, the parties are continuing to meet and confer to narrow and reduce the number of disputes arising from Defendants' requests concerning Plaintiffs' business information. Should any issues arise with respect to the implementation of the search strategies concerning the relevant product-market, or if the parties reach an impasse on issues related to Plaintiffs' business information, the parties propose to raise such issues with the special discovery masters as appropriate.

As always, we thank the Court for its continued attention to these matters and are available should Your Honors have any questions.

Respectfully submitted,

s/Liza M. Walsh

cc: All Counsel of Record (via ECF)

Liza M. Walsh